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From: Joyce Irby [<mailto:jbirby@earthlink.net>]

Sent: Thursday, April 01, 2004 11:47 PM

To: ofccp-public@dol.gov

Subject: Definition of An Applicant

I have been both in-house administering AAPs and have assisted companies in a consultant capacity as a staffing manager for over 15 years - in D.C. and CA.

Given that HR depts. are the last ones staffed in good times and the first ones cut in bad times, we have had to be practical. To consider someone an applicant who has submitted a resumes, whether qualified or not, over the internet (same as by postal service mail) is not practical and can be a disservice. In practice, it makes more sense to define an applicant as someone who is contacted by an employer for a phone screen or to come in and physically complete an application with the appropriate AAP tracking form included. At least by phone you can guess at the information needed to track applicants - since you are not legally allowed to ask someone about their race.

Also, sheer volume (I just received 90 resumes in one day for a position and only 10 seemed to actually read the online ad and to have the minimum qualifications) makes it impossible to comply with the definition of an applicant as is being proposed.

If the legislators and federal administrators sat for one day at a recruiter's desk and experienced first hand what kind of resumes come in, they would agree that too broad of a definition of an "applicant" does not work for anyone. If a recruiter had to look at each resume and track it for an AAP, even less time would be available than there is now to even respond to people. And people sending resumes deserve the respect of receiving a response....It's tough enough to be a job hunter right now.

Thank you for your consideration of the points I am raising. Joyce Irby Human Resources Consultant